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January 13, 2020

Via ECF

Hon. William H. Pauley
U.S. District Court, S.D.N.Y.
c/o United States Courthouse – Room 221
500 Pearl Street
New York, NY 10007

Application granted.

SO ORDERED:

Re: United States v. Michael Cohen
(18-cr-602 [W.H.P.])
(18-cr-852 [W.H.P.])


WILLIAM H. PAULEY III
U.S.D.J.

Dear Judge Pauley:

January 14, 2020

I respectfully write to Your Honor in the nature of an application pursuant to the Southern District Court's Electronic Case Filing Rules and Regulations Rule 6.1 to seek permission to file a single "Reply Affirmation" from co-counsel Michael Monico, Esq. under seal. Mr. Monico's Affirmation includes one exhibit (a March 20th, 2019 letter from his office to Assistant U.S. Attorney Thomas McKay), and a copy of referenced proffer notes. As you will note, Government counsel was provided with a copy of the application, and has consented, requesting that paragraph 4, and the first sentence of paragraph 5 be redacted. Mr. Monico's letter to Assistant U.S. Attorney McKay shall be appropriately redacted for public filing, and the supporting exhibits thereto sealed.

The reason for this application is to permit the filing of Michael Monico's Reply Affirmation discussing aspects of previously referenced proffer sessions containing information and details which involve third parties, and which, due to the pending of some of their cases, would be inappropriate in the public domain. There will, at minimum, be publicly filed Reply Affirmations from both (1) Michael D. Cohen, and (2) myself.

I have shared the application with Assistant U.S. Attorney Thomas McKay (who was provided with a copy of all documents in unredacted form), and he does not oppose this application.

Very truly yours,

/s/Roger B. Adler
Roger Bennet Adler
Attorney for Defendant Michael D. Cohen

RBA/gr
Cc:

Via email

Assistant U.S. Attorney Thomas McKay
c/o Acting United States Attorney Audrey Strauss